

Comments of J. White

08/03/05

To the Commission,

I know you are very busy, but I would like to know that as a “nobody” average citizen, I might have a chance to make a comment and actually have the Commissioners see them. Can you help?

The No-Code Arguments and why they are wrong:

1. Morse code is just another mode and should not be afforded any special priority over others. It is available to those who wish to use it. Morse proficiency should not be required for those who do not wish to use

the mode. COMMENT– THE COMMISSION HAS IN THE PAST RECOGNIZED THAT MORSE CODE IS DIFFERENT IN THAT IT REQUIRES DECODING BY EAR AND THAT TESTING IS NECESSARY TO DEMONSTRATE PROPER OPERATION OF A STATION. IN THE NPRM, THE COMMISSION FAILED TO ADDRESS THIS ISSUE FROM 98-143, IN THAT THE ITU REQUIREMENT WAS NOT THE ONLY REASON THE CODE REQUIREMENT WAS KEPT.

2. Manual radiotelegraphy communications has been superseded by more modern, reliable, accurate, faster and efficient means of communication. COMMENT- WHILE NEW MODES OF COMMUNICATION DEVELOP, VARIOUS FORMS OF CW ARE USED FOR STATION ID, VERY SLOW CW FOR LOW POWER APPLICATIONS, AND STILL USED ON MANY SHIPS AROUND THE WORLD. TELEGRAPHY IS A PART OF THE HISTORY OF AMATEUR RADIO AND THE SECOND MOST POPULAR MODE, REMOVING TELEGRAPHY TESTING NOW MAY SIMPLY BE PREMATURE.

3. Requiring manual telegraphy proficiency is not compatible with the radio amateur's mandated objective of contributing to the advancement of the radio art. COMMENT- IT IS ASSUMED THAT IN ORDER TO CONTRIBUTE TO THE ADVANCEMENT OF THE RADIO ART MEANS NEW THINGS. IF THIS ARGUMENT IS CORRECT, SSB MUST BE ELIMINATED, AM USE MUST BE ELIMINATED, ETC. THE COMMISSION SHOULD CONSIDER THAT THE RADIO ART IS ADVANCED BY MAINTAINING A STRONG FOUNDATION.

4.FCC evidence exists that Morse proficiency is not an indicator of a desirable,motivated or better qualified operator. COMMENT- TAKING THE CODE TEST DOES

NOT MAKE A PERSON A BETTER OPERATOR. USING CW DOES. AMATEURS WHO USE CW ARE PROPORTIONALLY BETTER OPERATORS ON PHONE. THEY GIVE GOOD HELP AND EXAMPLE TO OTHERS. LIKE SOME, I HATED THE CODE UNTIL I APPLIED MYSELF TO LEARN IT. REMOVING TELEGRAPHY TESTING MY REMOVE THE PROMARY WAY THAT PEOPLE DISCOVER THEY LIKE THE MODE. IF CW OPERATORS ARE BETTER OPERATORS, REMOVING TELEGRAPHY TESTING SHOWS THAT THE FCC DOES NOT "WALK THE TALK" WHERE OPERATING PRACTICES ARE CONCERNED.

THE TELEGRAPHY TEST IS INDEED A FILTER FOR WEEDING OUT A LOT OF UNDESIRABLE OPERATORS, IT IS NOT A PERFECT FILTER. WHERE FCC ENFORCEMENT COULD CLEAN UP THE AMATEUR BANDS IN A WEEKEND NOW, THIS CHANGE WILL RESULT IN A SITUATION LIKE THE CITIZENS BAND WHERE THE SHEER NUMBERS WILL OUTSTRIP THE ABILITY OF THE COMMISSION TO ENFORCE THE RULES.

5. The Morse code requirement serves as an advancement barrier to many otherwise qualified individuals. ONCE THE CODE REQUIREMENT IS REMOVED FROM GENERAL, IT WILL NO LONGER BE A BARRIER TO INDIVIDUALS FOR ENTRY. RETENTION OF THE TEST FOR EXTRA IS IN NO WAY A BARRIER TO ENTRY TO THE HOBBY.

6. The value of Morse code communications in the Amateur Service is primarily recreational in nature and manual telegraphy proficiency should no longer be a compulsory licensing requirement for any class of Amateur Radio license. COMMENT- THIS NO CODE COMMENT ACTUALLY SUPPORTS THE RETENTION OF TELEGRAPHY TESTING. IF THE SERVICE IS PRIMARILY RECREATIONAL, THEN ARGUMENTS ABOUT WHAT IS "STATE OF THE ART" OR NOT ABOUT TELEGRAPHY BECOME UNIMPORTANT. AS A RECREATIONAL ACTIVITY, TELEGRAPHY IS THE SECOND MOST POPULAR MODE. AS RECREATIONAL IN NATURE, THEN THERE IS GREATER LEEWAY FOR TRADITIONS, AND THE NEED FOR INCUMBENT GENERAL AND EXTRA OPERATORS TO HAVE THE LARGEST SAY IN WHAT HAPPENS.

7. The most challenging problem is our attitude towards change and newcomers and our focus on the mode of CW as the defining characteristic of Amateur Radio. If you do not operate the mode CW, or if you are not proficient with the CW mode, then you are not a real ham radio operator. COMMENT- THIS IS OF NO CONCERN TO THE COMMISSION. IF THE NO CODE TECHNICAN THINKS THAT THE PASSAGE OF THIS NPRM WILL MAKE PEOPLE RESPECT HIM,

THEN THIS PROCESS IS WASTED. PEOPLE MUST EARN RESPECT. PETITIONING THE GOVERNMENT TO CHANGE A REQUIREMENT BECAUSE THEY CANNOT QUALIFY ON THEIR OWN WILL NOT EARN THE NO CODE TECHNICIAN RESPECT. NOR WILL THE COMMISSION BE HELPING THE SITUATION. FRANKLY I AM SURPRISED THE COMMISSION DIDN'T DISMISS ALL 18 OF THE PETITIONS AND TELL US ALL TO FORGET IT AND BEHAVE OURSELVES.

IT MAY BE WORTH MENTIONING THAT WHEN NBC TELEVISION WANTED A MORSE OPERATOR TO COMPETE WITH TEXT MESSAGING ON THE "TONIGHT SHOW", THEY CAME TO AMATEUR RADIO. WHAT ON EARTH IS WRONG WITH BEING RECOGNIZED AS THE ONLY REMAINING POOL OF TRAINED TELEGRAPHY OPERATORS? IT WILL COST THE COMMISSION NOTHING TO ALLOW THIS TO CONTINUE AS A FALL BACK COMMUNICATION OPTION, BUT BILLIONS IF IT EVER HAS TO BE REINSTITUTED.

8. I do not have good ideas on how to change the mode attitudes. I wish I did because I believe the mode attitude is the Achilles Heel of the Amateur Radio Hobby. Changing our attitude towards change and new comers is a key part of growing Amateur radio in the future. COMMENT – NEWCOMERS WHO WISH TO LEARN HAVE ALWAYS BEEN WELCOMED IN AMATEUR RADIO. MANY NO CODERS EXPECT PEOPLE TO AUTOMATICALLY RESPECT THEM, THEY BRING IN THEIR "KNOWLEDGE" FROM THE OUTLAW CB BAND AND ARE SURPRISED WHEN IT IS NOT WANTED. THE WAY YOU ARE ACCEPTED IN ANY ADVENTURE IS TO LISTEN AND LEARN, DON'T BE A KNOW-IT-ALL, DON'T TRY TO CHANGE THINGS YOU CAN'T QUALIFY FOR, AND BE FRIENDLY.

10. Morse Testing is a barrier to technically inclined and the youth of our country- COMMENT- THE YOUTH OF OUR COUNTRY WANT COMPUTER THINGS, NOT HAM RADIO. THE WRONG THOUGHT PROCESS HERE IS THAT REMOVING TELEGRAPHY TESTING IS A MAGIC WAND TO CURE ALL ISSUES. IT WILL ONLY ATTRACT POORLY MOTIVATED CB OPERATORS, AND CURRENT NO CODE TECHS WHO WANT TO TALK SKIP LEGALLY. THE NO CODE TECHNICIAN LICENSE HAS EXISTED FOR YEARS AND ALLOWS OPERATION ON FREQUENCIES WHERE BANDWIDTH ALLOWS MORE COMPUTER RELATED ACTIVITY. WHERE ARE THE ADVANCEMENTS? THEY ARE SAYING "JUST REMOVE CODE TESTING AND WE'LL CONTRIBUTE TO THE RADIO ART!". WHAT HAVE THEY DONE AS TECHNICIAN CLASS OPERATORS? WILL THE REMOVAL OF TELEGRAPHY TESTING TAKE PEOPLE WHO LACK THE MOTIVATION TO PASS A 5WPM TELEGRAPHY TEST AND AUTOMATICALLY MAKE THEM SUPER-HAMS? NO. THEY WILL SHOOT SKIP, THEY WILL WHINE ABOUT NOT BEING RESPECTED, THEY WILL CONTINUE TO TRY TO ERODE CW, AND THEY WILL NOT CONTRIBUTE ANYTHING TO THE RADIO ART BUT ENFORCEMENT PROBLEMS.

For these reasons I ask the Commission to at least keep telegraphy testing for Extra, if for no other reason than to offer some thanks to CW operators who continue to enjoy the service as good operators, and as a compromise so for once, the lazy underachievers of the world do not completely win in wrecking the Amateur Service. If 2/3 of your comments favor removal, then it is reasonable that 2/3 of the license classes are codeless.

I would humbly suggest that the Commission (if you can find a telegraphy person in government), take transcripts from the CW bands and compare with what you hear on 2 meters and on the HF bands. If you can't notice the difference, then we're in worse shape than we thought. My sincere appreciation for listening.

Thank You,
John White
100 Concourse Parkway,
Hoover, Alabama